## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

J & M Sales, Inc., et al., 

Debtors.

Case No. 18-11801 (JTD)

George L. Miller, not individually, but as Chapter 7 Trustee of J & M Sales, Inc., et al.,

Plaintiff,
Vs.

Defendants Listed Below,

Chapter 7

Case No. 18-11801 (JTD)

(Jointly Administered)

Obj. Deadline: February 4, 2021 at 4:00 p.m. (ET)

Hrg. Date: February 25, 2021 at 11:00 a.m. (ET)

| Defendants   | Adversary Number |
|--|------------------|
| American Express Travel Related Services Company, Inc.     | 20-50038         |
| C.H. Robinson Worldwide, Inc.                              | 20-50114         |
| Seldat, Inc.   | 20-50334         |
| Shewak Lajwanti Home Fashions, Inc. dba S.L. Home Fashions | 20-50338         |

Defendant.

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on January 14, 2021, George L. Miller, not individually, but as Chapter 7 Trustee of J & M Sales, Inc., et al (the "<u>Trustee</u>" or "<u>Plaintiff</u>"), filed **Plaintiff's Third Motion for an Order Approving Settlements of Avoidance Actions Pursuant to Fed. R. Bankr. P. 9019** (the "<u>Motion</u>") with the United States Bankruptcy Court for the District of Delaware (the "<u>Bankruptcy Court</u>").

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel on or before **February 4, 2021 at 4:00 PM** (the "Objection Deadline").

<sup>1</sup> Debtors in these Chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: J & M Sales Inc. (4697); National Stores, Inc. (4874); J&M Sales of Texas, LLC (5979); FP Stores, Inc. (6795); Southern Island Stores, LLC (8099); Southern Island Retail Stores LLC (4237); Caribbean Island Stores, LLC (9301); Pazzo FNB Corp. (9870); Fallas Stores Holdings, Inc. (6052); and Pazzo Management LLC (1924).

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed, served and received and such objection is not otherwise timely resolved, a hearing to consider such objection and the Motion will be held before the Honorable John T. Dorsey on February 25, 2021 at 11:00 AM at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware. Only those objections that are timely filed and served so as to be received on or before the Objection Deadline will be considered by the Court.

IF YOU DO NOT PROPERLY FILE AND SERVE AN OBJECTION OR OTHER RESPONSE TO THE MOTION BY THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: January 14, 2021

## BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

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